

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,

v.

DELIA J. BAEZ

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DISTRICT COURT
DISTRICT OF MASS.
CIVIL ACTION
NO: 05-10401-RCL

ANSWER OF DEFENDANT DELIA J. BAEZ TO THE COMPLAINT

The defendant Delia J. Baez respectfully submits the following Answer to the complaint of the United States in the above referenced action. The following numbered responses correspond to the numbered paragraphs of the complaint of the United States.

I. Introduction

1. The defendant Delia Baez denies the allegations of paragraph one of the complaint.
2. The defendant Delia Baez denies the allegations of paragraph two of the complaint.

II. Jurisdiction and Venue

3. This is a jurisdictional statement to which the defendant need not reply.
4. This paragraph is a statement of venue to which the defendant need not reply.

III. The Facts

5. The defendant Delia Baez denies the allegations of paragraph five of the complaint.
6. The defendant Delia Baez denies the allegations of paragraph six of the complaint.
7. The defendant Delia Baez denies the allegations of paragraph seven of the complaint.
8. The defendant Delia Baez denies the allegations of paragraph eight of the complaint.
9. The defendant Delia Baez denies the allegations of paragraph nine of the complaint.
10. The defendant Delia Baez denies the allegations of paragraph ten of the complaint.
11. The defendant Delia Baez denies the allegations of paragraph eleven of the complaint.
12. The defendant Delia Baez denies the allegations of paragraph twelve of the complaint.
13. The defendant Delia Baez denies the allegations of paragraph thirteen of the complaint.
14. The defendant Delia Baez denies the allegations of paragraph fourteen of the complaint.

15. The defendant Delia Baez denies the allegations of paragraph fifteen of the complaint.

16. The defendant Delia Baez denies the allegations of paragraph sixteen of the complaint.

FIRST CAUSE OF ACTION

(False Claims Act – Housing Assistance)

17. The defendant Delia Baez denies the allegations of paragraph seventeen of the complaint.

18. The defendant Delia Baez denies the allegations of paragraph eighteen of the complaint.

19. The defendant Delia Baez denies the allegations of paragraph nineteen of the complaint.

SECOND CAUSE OF ACTION

(False Claims Act – Income Assistance and Food Stamps)

20. The defendant Delia Baez denies the allegations of paragraph twenty of the complaint.

21. The defendant Delia Baez denies the allegations of paragraph twenty-one of the complaint.

22. The defendant Delia Baez denies the allegations of paragraph twenty-two of the complaint.

THIRD CAUSE OF ACTION

(False Claims Act – Medical Assistance)

23. The defendant Delia Baez denies the allegations of paragraph twenty-three of the complaint.

24. The defendant Delia Baez denies the allegations of paragraph twenty-four of the complaint.

25. The defendant Delia Baez denies the allegations of paragraph twenty-five of the complaint.

FOURTH CAUSE OF ACTION

(Common Law Fraud)

26. The defendant Delia Baez denies the allegations of paragraph twenty-six of the complaint.

27. The defendant Delia Baez denies the allegations of paragraph twenty-seven of the complaint.

28. The defendant Delia Baez denies the allegations of paragraph twenty-eight of the complaint.

FIFTH CAUSE OF ACTION

(Unjust Enrichment)

29. The defendant Delia Baez denies the allegations of paragraph twenty-nine of the complaint.

30. The defendant Delia Baez denies the allegations of paragraph thirty of the complaint.

31. The defendant Delia Baez denies the allegations of paragraph thirty-one of the complaint.

SIXTH CAUSE OF ACTION

(Payment by Mistake of Fact)

32. The defendant Delia Baez denies the allegations of paragraph thirty-two of the complaint.

33. The defendant Delia Baez denies the allegations of paragraph thirty-three of the complaint.

AFFIRMATIVE DEFENSES

The defendant reserves the right to amend the answer to the complaint for the purpose of asserting affirmative defenses.

Respectfully submitted,
DELIA J. BAEZ
By her lawyer,

8/30/05
Date

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